

LAW OFFICES  
**BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP**

BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SISAK  
D. CARY MITCHELL  
SALVATORE TAILLEFER, JR.

2120 L STREET, NW  
WASHINGTON, DC 20037  
  
(202) 659-0830  
FACSIMILE: (202) 828-5568

November 7, 2018

ARTHUR BLOOSTON  
1914 – 1999

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY  
OF COUNSEL

EUGENE MALISZEWSKYJ  
ENGINEERING CONSULTANT

**WRITER'S CONTACT INFORMATION**

sta@bloostonlaw.com  
202-828-5562

**REDACTED – FOR PUBLIC INSPECTION**

*VIA HAND DELIVERY*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: FCC Order DA 18-728  
WC Dockets No. 14-58 and 10-90

Dear Ms. Dortch:

Pursuant to the Commission's *Order* of July 13, 2018, Oregon Farmers Mutual Telephone Company (the Company) hereby notifies the Commission that it has filed its audited financial statements from 2014, 2015, and 2016, as required by §54.313(f)(2).<sup>1</sup> A copy of this information is attached hereto, and has been provided to the appropriate state regulatory commission and/or tribal government, as appropriate.

Pursuant to the *Protective Orders* adopted by the Commission in these proceedings,<sup>2</sup> the Company requests confidential treatment for this financial information, on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment under Sections 0.457 and 0.459 of the Commission's Rules.

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<sup>1</sup> *In the Matter of Connect America Fund*, ORDER, WC Docket No. 10-90, DA 18-728, released July 13, 2018, at ¶6.

<sup>2</sup> *In the Matter of Connect America Fund, et al.*, PROTECTIVE ORDERS, WC Docket No. 10-90, et al., DA 12-1875 (released November 16, 2013), DA 15-712 (released June 17, 2015), DA 16-296 (released March 22, 2016.).

A letter in support of the Company's request is attached hereto.

In accordance with the *Protective Order* and the Commission's rules, one redacted copy has been filed via ECFS, and confidential, one non-redacted copy has been submitted on paper via hand delivery to the Secretary's Office.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Salvatore Taillefer, Jr.", with a stylized, cursive script.

Salvatore Taillefer, Jr.

Counsel to  
Oregon Farmers Mutual Telephone Company

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Washington, DC 20554

RE: FCC Order DA 18-728  
WC Dockets No. 14-58 and 10-90

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Oregon Farmers Mutual Telephone Company ("the Company"), by its attorney, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the financial information submitted herewith ("Confidential Information").

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

1. *Identification of the specific information for which confidential treatment is sought.*

The Company seeks confidential treatment of its audited financial statements for 2014, 2015, and 2016.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

These documents are being submitted in response to the Commission's *Order* of July 13, 2018.<sup>3</sup>

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<sup>3</sup> *In the Matter of Connect America Fund*, ORDER, WC Docket No. 10-90, DA 18-728, released July 13, 2018, at ¶6.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive financial information which "would customarily be guarded from competitors,"<sup>4</sup> and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.<sup>5</sup>

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Confidential Information relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the confidential information is likely to result in substantial competitive harm to the Company because the confidential information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

The Company does not make the Confidential Information publically available in any way, and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

The Company does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The confidential information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the

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<sup>4</sup> *Id.* § 0.457(d)(2).

<sup>5</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', with a stylized, cursive script.

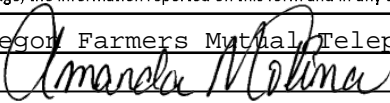
Salvatore Taillefer, Jr.  
Counsel for  
Oregon Farmers Mutual Telephone Company

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2018

<010> Study Area Code	421935
<015> Study Area Name	Oregon Farmers Mutual Telephone
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9042590029
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	Oregon Farmers Mutual Telephone Company
Signature of Authorized Officer:	 Date 10-30-2018
Printed name of Authorized Officer:	Amanda Molina
Title or position of Authorized Officer:	Vice President of External Relations
Telephone number of Authorized Officer:	9042590029
Study Area Code of Reporting Carrier:	421935 Filing Due Date for this form: November 13, 2018
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED –  
AUDITED FINANCIAL STATEMENTS 2014

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: OREGON FARMERS MUT	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 10/25/2016
Printed name of Authorized Officer: Nicholas Robb	
Title or position of Authorized Officer: Court Appointed Receiver	
Telephone number of Authorized Officer: 6604463391 ext.	
Study Area Code of Reporting Carrier: 421935	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



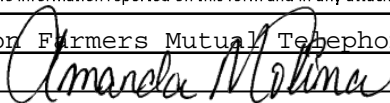
REDACTED –  
AUDITED FINANCIAL STATEMENTS 2015

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2018

<010> Study Area Code	421935
<015> Study Area Name	Oregon Farmers Mutual Telephone
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9042590029
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	Oregon Farmers Mutual Telephone Company
Signature of Authorized Officer:	 Date 10-30-2018
Printed name of Authorized Officer:	Amanda Molina
Title or position of Authorized Officer:	Vice President of External Relations
Telephone number of Authorized Officer:	9042590029
Study Area Code of Reporting Carrier:	421935 Filing Due Date for this form: November 13, 2018
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED –  
AUDITED FINANCIAL STATEMENTS 2016